

U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeal and FLSA Programs

Dallas Oversight Division  
1100 Commerce Street, Room 4C22  
Dallas, TX 75242-9968

**Classification Appeal Decision**  
**Under section 5112 of title 5, United States Code**

**Appellant:** [appellant's name]

**Agency classification:** Management Directives Specialist  
GS-301-9

**Organization:** [appellant's specific organizational  
location]  
National Aeronautics and Space  
Administration  
[city, state]

**OPM decision:** GS-301-9  
title at agency discretion

**OPM decision number:** C-0301-09-03

/s/ Bonnie J. Brandon

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Bonnie J. Brandon  
Classification Appeals Officer

July 17, 2001

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Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

### **Decision sent to:**

[appellant's name and address]

[name and address of appellant's designated  
representative]

[servicing human resources office]

Director of Personnel  
National Aeronautics and Space  
Administration  
Washington, DC 20546

## **Introduction**

The Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant] on April 10, 2001. [The appellant] is a Management Directives Specialist, GS-301-9, assigned to [an organization] at the National Aeronautics and Space Administration's (NASA) [center, city, state]. The appellant believes that her position should be classified as Management or Program Analyst, GS-343-15. We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.).

In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and her agency, including the official position description (PD), [number]. We also conducted a telephone audit with the appellant and had telephone discussions with the appellant's supervisor, the Center's chief counsel and his staff, and the Center's classification and wage officer.

The appellant believes her PD accurately lists her major duties. However, she believes that the level of knowledge required, complexity and scope, and supervisory controls as they are described in her official PD do not accurately reflect the level and importance of her responsibilities at the Center.

## **General issues**

The appellant indicated that she believes her position should be at a higher grade level because the Center's employee previously responsible for directives, issuances, and Privacy Act systems of records as part of his duties was a GS-15. Additionally, the appellant states that positions at other NASA centers with duties and responsibilities similar to hers are graded at GS-13 and above. By law, we must classify positions by comparing their current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to the standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding her appeal.

## **Position information**

The appellant is responsible for maintaining the Center's Management Directives and Issuances System on the agencywide NASA Online Directives Information System (NODIS) Library. Her duties include coordinating the review of new and existing Center issuances and directives to ensure that they reflect current agency and Center policy. The appellant provides guidance to Center personnel on the proper preparation, processing, and maintenance of directives. She ensures that proposed documents do not duplicate, overlap, or conflict with other management directives in the system. The appellant also reviews proposed directives for clarity and editorial standards. When directives are promulgated or revised by NASA headquarters, the appellant prints the directives from NODIS, determines which Center organizations may be affected, and routes copies of the directives to the appropriate organizations for comments. The appellant consolidates the comments and prepares a recommended response for signature by the Center Director.

The appellant's duties as the Privacy Act Manager include oversight for the Center's systems and subsystems of records. By conducting periodic reviews, she ensures that the systems' operating plans are implemented in compliance with the Privacy Act and that appropriate procedures and safeguards are in place in accordance with agency and Center policy. The appellant reports the status of the systems to management as required. She provides information on the Privacy Act, when requested, and issues periodic notices reminding Center personnel of their responsibilities under the Privacy Act. The appellant does not provide legal interpretation on the Act; requests for legal interpretations are handled by the Center's legal counsel. Further, the appellant does not respond to external requests for information covered by the Act. The Public Affairs Officer at the Center responds to external requests for such information.

### **Series determination**

The Management and Program Analysis Series, GS-343, covers positions that primarily serve as staff analysts, evaluators, and advisors to management on the effectiveness and efficiency with which agencies and their components carry out their assigned programs and functions. Management and Program Analysts' major duties include developing and conducting studies and other types of analyses in order to provide line managers objectively based information for making decisions on administrative and programmatic aspects of agency management and operations. The predominant knowledges required for positions in this series are of management principles and processes and the analytical and evaluative methods and techniques for assessing program development or execution and improving effectiveness and efficiency.

The GS-301 Miscellaneous Administration and Program Series covers positions involved in the performance of two-grade interval work for which no other series is appropriate. This series includes specialized work which requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative and/or program principles, concepts, policies, and objectives.

The appellant reviews local and headquarters level directives and issuances to determine which Center organizations may be affected and for compliance with agency and Center policy and guidelines. She also analyzes the directives to ensure new or revised directives do not conflict with existing directives and that there are no inconsistencies when more than one organization has made changes to a policy. If inconsistencies are found, the appellant requests the originating organizations to review and resolve them. The type and level of analysis conducted by the appellant does not approach the depth and breadth of analysis envisioned in the GS-343 Management and Program Analysis Series where analysts make assessments of a whole program's effectiveness. Further, the paramount qualification required for the appellant's position is the procedural knowledge of preparing a directive or issuance for publication and of NODIS rather than knowledge of management principles and analytical and evaluative methods for assessing program effectiveness and efficiency. The analytical knowledge, the substantive knowledge of the directives program, and the knowledge of the principles or concepts of administration required for the appellant's position meet the criteria for the GS-301 series. Therefore, the appellant's position is appropriately assigned to the GS-301 series.

## **Title and guide determination**

There are no titles prescribed for positions in the GS-301 series. Agencies may designate the official title of GS-301 positions, consistent with guidelines in the *Introduction to the Position Classification Standards*.

The GS-301 standard has no associated grade evaluation criteria. The Center used the Administrative Analysis Grade Evaluation Guide (which is written in the Factor Evaluation System (FES) format) and the Primary Standard (the “standard for FES standards”) to evaluate the appellant’s work. We agree that the Guide is appropriate for evaluation of the appellant’s work. The Guide provides grade level criteria for nonsupervisory staff involved in administrative analytical work. As with the appellant’s position, the work covered by the Guide does not require specialized educational preparation; however, the work does require a high degree of analytical skills, the ability to research problems and issues, and the application of mature judgment in problem solving.

## **Grade determination**

Under the FES, each factor level description under the nine factors in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the nine FES factors in the Administrative Analysis Grade Evaluation Guide follows.

### *Factor 1, Knowledge required by the position*

This factor is used to measure the nature and extent of information or facts that the employee must understand to do acceptable work and the nature and extent of the skills needed to apply that knowledge.

Positions at Level 1-6 require skill in applying analytical techniques to identify, consider, and resolve issues or problems of a procedural or factual nature. Problems or issues deal with readily observable conditions, written guidelines covering work methods and procedures, and information of a factual nature. Included at this level is knowledge of the theory and principles of management and organization, including administrative practices and procedures common to organizations such as channels of communication, routing of correspondence, and filing systems.

In addition to the knowledge required at Level 1-6, assignments at Level 1-7 require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of programs. This level includes knowledge of pertinent laws, regulations, policies, and precedents that affect the use of program and related support resources (people, money, or equipment) in the area studied.

Knowledge at Level 1-7 is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a

program or support setting. Assignments require knowledge and skill in adapting analytical techniques and evaluation criteria to measure and improve program effectiveness and/or organizational productivity. An employee at this level applies knowledge in developing new or modified work methods, organizational structures, records and files, management processes, or staffing patterns. An illustration of assignments at this level includes developing manuals and directives covering the administrative aspects of field station operations. Such work requires a thorough knowledge of agency programs, operations, objectives, and policies along with a comprehensive knowledge of management and organizational techniques, systems, and procedures.

The appellant must have a thorough knowledge of NODIS and the Directives Management System. Included in this is an in-depth knowledge of hypertext mark-up language (html) to facilitate in the planning, design, implementation, and upkeep of Web pages. She must also be knowledgeable in Center organizational structure, programs, and policy. She must be familiar with the Privacy Act and agency policy and Center systems of records under the Act. The appellant applies this knowledge in the day-to-day review of Center and agency directives to analyze and identify issues and inconsistencies for resolution by the appropriate organization. The knowledge required for the appellant's position fully meets Level 1-6.

Level 1-7 is not met. The appellant's position does not require knowledge and skill in applying analytical and evaluative methods and techniques to develop new or modified work methods for organizational use of NODIS, organizational structures, or management processes for the Directives Management System. The appellant is not required to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of NODIS or the Privacy Act systems of records. Further, she does not develop manuals and directives as envisioned for positions at Level 1-7.

We evaluate this factor at Level 1-6 and assign 950 points.

### *Factor 2, Supervisory controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work and to participate in establishing priorities and defining objectives.

At Level 2-3, the supervisor assigns specific projects in terms of issues, organizations, functions, or work processes to be studied and sets deadlines for completing the work. The supervisor or higher grade analyst provides assistance on controversial issues or on the application of qualitative or quantitative analytical methods to the study of subjects for which precedent studies are not available. The employee plans, coordinates, and carries out the successive steps in fact-finding and analysis of issues necessary to complete each phase of assigned projects. Work problems are normally resolved by the employee without reference to the supervisor, in accordance with the accepted office policies, applicable precedents, organizational concepts,

management theory, and occupational training. The employee's work is reviewed for conformance with overall requirements and practicality of recommendations.

At Level 2-4, the employee and supervisor develop a mutually acceptable work plan. Within the framework of the work plan, the employee is responsible for planning and organizing the work, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves definitive interpretation of regulations and handling deviations from established procedures. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed projects, reports, and recommendations are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving objectives.

The appellant works under the supervision of the [organization's] Branch Chief. The appellant also has a division lead to whom she may turn for questions or problems. On a weekly basis, the Branch Chief meets with the appellant to prioritize the appellant's work assignments. In the day-to-day performance of her duties, the appellant plans and conducts step-by-step analysis and fact-finding in accordance with prescribed policy and procedures. Work problems are normally resolved by the appellant using accepted policies, procedures, and precedents. Any significant problems or deviations from those policies and procedures are addressed to the appellant's supervisor. As Privacy Act Manager, the appellant is limited to providing factual information and references to employees as requested. Any questions concerning legal interpretations of the Privacy Act are referred to the Center's chief legal counsel and his staff. The appellant's oversight duties for Privacy Act systems of records consist of reviewing the operating plans for those systems to ensure that they are in compliance with the Act. The appellant's position meets Level 2-3.

Level 2-4 is not met. The appellant does not plan and organize work projects, estimate costs, coordinate projects with staff and line management, and conduct all phases of a project as envisioned for a position at Level 2-4. In contrast to positions at that level, the appellant's work does not involve the definitive interpretation of regulations and study procedures and the initial application of new methods, for either NODIS or the Privacy Act systems of records.

We evaluate this factor at Level 2-3 and assign 275 points.

### *Factor 3, Guidelines*

This factor covers the nature of guidelines and the judgment needed to apply them.

Guidelines at Level 3-3 consist of standard reference material, texts, and manuals covering application of analytical methods and techniques and instructions and manuals covering subjects involved (e.g., procedures, policies, and regulations). Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. However, precedent studies of similar subjects are available for reference. The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. Level 3-3 includes work assignments in which the subject studied is covered by a wide variety of administrative regulations and procedural guidelines. In such circumstances, the employee must

use judgment in researching regulations and in determining the relationship between guidelines and organizational efficiency or program effectiveness.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories that require considerable adaptation and/or interpretation for application to issues and problems. Administrative policies and precedent studies provide a basic outline of the results desired, but they do not go into detail as to the methods used to accomplish projects. Administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of the workforce or productivity targets. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines such as implementing regulations.

Similar to Level 3-3, the appellant's work involves systems and assignments for which established procedures and guidelines exist. This guidance includes NASA and Center directives, policies, operating manuals, and the Privacy Act (e.g., NASA Directives System that includes NASA Policy Directives and NASA Procedures and Guidelines, [a specific] Center Management Directives System Manual, [a specific] Center Policy on the Privacy Act of 1974). The appellant uses judgment to interpret and adapt these procedures and guidelines to research new and existing directives for inconsistencies and conflicting information, to provide factual information on the Privacy Act, and to ensure that Center systems of records are in compliance with the Privacy Act. The appellant's position fully meets Level 3-3.

The appellant's position does not meet Level 3-4 in that specific instructions are provided by agency and Center directives, policies, and operating manuals. The supervisor also provides a basic outline that the appellant must use to develop methods to accomplish projects. The appellant's position does not require considerable adaptations or interpretations of general administrative policies for application to issues or problems studied for the use of the Directives Management System as would be indicative of a position evaluated at Level 3-4.

We evaluate this factor at Level 3-3 and assign 275 points.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-3, the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations, issues, or other subjects studied. The employee analyzes the issues in the assignment, then selects and applies accepted analytical techniques and trend analysis to the resolution of procedural problems and conflicting information. An example of work at this level is the conduct of management surveys to determine compliance with applicable regulations and procedures and sound management practices. Such surveys deal primarily with procedural aspects rather than the substance of administrative operations.



Level 4-4 work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program or program support setting. This is in addition to improving conditions of a procedural nature which relate to the efficiency of organizations and workers as described at Level 4-3. Work envisioned at Level 4-4 includes studying, analyzing, and developing methods to improve the accuracy, adequacy, and timeliness of information and systems for disseminating information about the agency's programs and workforce at many organizational echelons. Level 4-4 work also includes providing advice to management on the distribution of work among positions and organizations and the efficient utilization of positions and employees in programs and program support areas.

The appellant's position meets Level 4-3. Her work involves various duties related to maintenance of the Center's portion of NODIS, the Management Directives System, and systems of records covered by the Privacy Act. The appellant also informs Center employees of their responsibilities under the Act. When the appellant receives a new or revised Center directive, she analyzes it to determine which Center organizations may be affected. She then follows standardized procedures for soliciting comments from organizations within the Center, consolidating those comments, and developing a summary of comments and opinions provided by organizations that may be affected. The appellant reviews directives and issuances for adherence to format policy and for clarity of information and then makes recommendations for improvement to the appropriate organizations. She also analyzes the directives and issuances to ensure that they do not have conflicting information or guidance within them and that they do not conflict with existing policies. She does not analyze the policy for content or make recommendations on the subject matter of the directives. The problems and obstacles the appellant may encounter are of a procedural nature rather than with the program or policy subject matter covered by the directives. The appellant also maintains and updates Center organizational charts and listings; however, she does not make recommendations regarding staffing requirements or the organizational structure of the Center.

Unlike employees at Level 4-4, the appellant does not analyze directives in terms of effectiveness and efficiency of workflow for programs covered. She addresses any areas of concern to her supervisor or to the originating organization for resolution. The complexity of the appellant's work falls short of Level 4-4.

We evaluate this factor at Level 4-3 and assign 150 points.

#### *Factor 5, Scope and effect*

This factor assesses the relationship between the nature of work, i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

The purpose of the work at Level 5-3 is to plan and carry out projects to improve the efficiency and productivity of organizations and employees in administrative support activities. The employee identifies, analyzes, and makes recommendations to resolve conventional problems and situations in workflow, work-distribution, and/or administration. Work may involve

developing detailed procedures and guidelines to supplement established administrative regulations or program guidance. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied. An example of work at this level is analyzing and evaluating current management and organizational practices to determine the most efficient way to organize work within a word processing center, records holding area, or comparable clerical organization. Another illustration of work at Level 5-3 involves developing standard procedures for records management, for example, storing, retrieving, and routing records and files for local organizations with similar missions and functions.

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness, and efficiency of administrative support and staff activities. The work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different echelons and/or geographical locations within organizations. For example, work at this level may involve studying, analyzing, and developing ways to improve the accuracy, adequacy, timeliness, and validity of data and systems for disseminating information about the agency's programs to managers. Other work at this level may include providing advice on changes to organizational structures, organizational charts, and mission and function statements to implement reorganizations or changes in program administration in order to reduce or eliminate functional overlap among the agency's substantive programs. Completed work contributes to the effectiveness, efficiency, and productivity of large organizations within the agency.

The appellant's primary duty as Directives Manager is to ensure that clear, properly formatted directives and issuances are prepared, distributed, and maintained in accordance with policy and regulations. The directives may be from NASA headquarters or from organizations within the Center. They may affect a single organization or program within the Center, a number of Center organizations or programs, or the Center as a whole. As Privacy Act Manager, the appellant helps to ensure the privacy of employee personal information through Centerwide notices on employee responsibility and by oversight of approximately 20 systems of records covered by the Privacy Act. The appellant's work facilitates the efficiency and productivity of the Center by ensuring that policies are current, properly categorized, and formatted for ready access; do not have conflicting information or guidelines; and adhere to NASA plain language policy for ease of reading and understanding. The appellant's position meets Level 5-3.

Level 5-4 is not met in that the appellant is not required to assess the productivity, effectiveness, or efficiency of programs or activities covered by NASA and Center directives. Although the appellant maintains organizational charts for the Center, she does not advise on changes to organizational structures, etc., as illustrated at Level 5-4. The appellant's position does not approach the scope and effect of the Level 5-4 description.

We evaluate this factor at Level 5-3 and assign 150 points.

### *Factors 6 and 7, Personal contacts and Purpose of contacts*

The Guide combines the point values for these two factors into a matrix. For this reason, the factors are addressed jointly.

Factor 6 includes face-to-face contacts and telephone and electronic mail dialogue with persons not in the supervisory chain. Levels in this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contacts take place.

For Level 2, the personal contacts are with employees in the same agency, but outside the immediate office, or employees and representatives of private concerns in a moderately structured setting. For Level 3, personal contacts are with individuals or groups from outside the employing agency in a moderately unstructured setting. Typical contacts at this level include the head of an employing agency or program officials several managerial levels removed from the employee when such contacts occur on an ad-hoc basis.

Similar to Level 2, the majority of the appellant's personal contacts are with employees from organizations within the Center and the Center's satellite installation at [geographic location], by telephone, electronic mail, or formal correspondence. In addition, the appellant regularly interacts with her counterparts at NASA headquarters. In contrast to Level 3, the appellant has no significant personal contact with individuals outside NASA in either a structured or unstructured setting. The appellant's position has no significant interaction on either a regular or an ad-hoc basis with high level management officials at the Center or at NASA headquarters.

We evaluate Factor 6 at Level 2.

For Factor 7, the purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives.

At Level b, the purpose of personal contact is to advise managers on noncontroversial organization or program related issues and concerns. Contacts typically involve such matters as identification of decision-making alternatives, appraisals of success in meeting goals, or recommendations for resolving administrative problems. At Level c, the purpose is to influence managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. Positions at Level c may encounter resistance due to such issues as organizational conflict, competing objectives, or resource problems.

The purpose of the appellant's personal contacts is to obtain and exchange information of a factual nature. She also obtains comments and opinions on NASA and Center policy directives and Privacy Act issues to consolidate them into a Center response. The appellant notifies Center organizations when inconsistencies exist in the organizations' responses to NASA headquarters directives which she has identified during her analysis as well as when she has determined new and existing directives and issuances are in conflict. The purpose of the appellant's contacts

does not exceed Level b. In her capacity as Directives Manager and Privacy Act Manager, the appellant does not encounter resistance as the result of organizational conflict, competing objectives, or resource problems. Her position does not require her to influence managers or other officials to accept and implement findings and recommendations on organizational improvement of program effectiveness as is envisioned at Level c.

We evaluate Factors 6 and 7 at Level 2b and assign 75 points.

*Factor 8, Physical demands*

This factor covers the requirements and physical demands placed on the employee by the work assignment.

The work is sedentary at Level 8-1. The employee typically sits comfortably to do the work. However, there may be some walking, standing, bending, or carrying of light items. No special physical demands are required to perform the work.

Level 8-2 assignments regularly involve long periods of standing, bending, and stooping to observe and study work operations in an industrial, storage, or comparable work area.

The work done by the appellant is primarily sedentary.

We evaluate this factor at Level 8-1 and assign 5 points.

*Factor 9, Work environment*

This factor considers the risks and discomforts in the employee's physical surroundings.

At Level 9-1, work is typically performed in an adequately lighted and climate controlled office. The work may require some travel.

At Level 9-2, work assignments regularly require visits to manufacturing, storage, or other industrial areas and involve moderate risks or discomforts. Protective clothing and gear and observance of safety precautions are required.

The appellant works in an air conditioned and heated office with adequate lighting.

We evaluate this factor at Level 9-1 and assign 5 points.

*Summary of factor evaluation*

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. and 7. Personal contacts and Purpose of contacts	2b	75
8. Physical demands	8-1	5
9. Work environment	9-1	5
<b>Total</b>		1,885

The appellant's position is credited with 1,885 points. Therefore, in accordance with the grade conversion table of the Guide, the position is properly graded at GS-9.

**Decision**

The proper classification of the appellant's position is GS-301-9, with the title at the discretion of the agency.